



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

IDD 6888
8-31-11
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OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

AUG 31 2011

Certified Mail Number 7011 0470 0002 9128 5445
Return Receipt Requested

James Cagle, Risk Manager - EHS
Nu-West Industries, Inc.
Agrium Conda Phosphate Operations
3010 Conda Road
Soda Springs, Idaho 83276

Re: Upgradient Monitoring Well Drilling – Request for EPA Guidance
Administrative Order on Consent for Nu-West CPO Facility
Docket No. RCRA-10-2009-0186

Dear Mr. Cagle:

The purpose of this letter is to provide approval to your request for a variance from the Work Plan for Additional Requirements ("Work Plan") at borehole locations A-13 and A-17, as discussed in the letter from WSP Environment and Energy dated August 29, 2011 that you forwarded to EPA.

The Work Plan requires downhole geophysical logging to be conducted at each new borehole advanced, utilizing a suite of technical methods. After a review of the information provided by Agrium Nu-West Industries Inc., ("Nu-West"), and after having discussed with your staff yesterday the geological conditions encountered during advancement of the up-gradient boreholes, EPA concurs that the downhole geophysical logging is not necessary at borehole locations A-13 and A-17.

Nu-West may proceed with installation of monitoring wells at borehole locations A-13 and A-17, as proposed in the letter from WSP Environment and Energy dated August 29, 2011. The screening intervals are proposed to be 135 to 115 feet below ground surface at location A-13, and 150 to 130 feet below ground surface at location A-17. Should your technical staff obtain new information that identifies better screening intervals at these two locations as the site investigation and drilling activities proceed, please contact EPA and provide alternative recommendations.

If you have any questions, feel free to call me at (206) 553-2964. Alternatively, you may reach me via email at Magolske.Peter@epamail.epa.gov. Thank you for your attention to this important matter.

Sincerely,

Peter Magolske
Air / RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality
P. Scott Burton, Esq. Hunton and Williams LLP

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